

UNITED STATES DISTRICT COURT
IN THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION

MARGUERITE CARRUBBA

PLAINTIFF

V.

CIVIL ACTION NO. 1:07CV1238-LG-RHW

HARRISON COUNTY, MISSISSIPPI BY AND
THROUGH ITS BOARD OF SUPERVISORS;
HARRISON COUNTY SHERIFF GEORGE PAYNE;
WAYNE PAYNE; DIANE GATSON RILEY;
STEVE CAMPBELL; RICK GATSON; RYAN TEEL;
KARLE STOLZE, WILLIAMS PRIEST, JAMES A.
GONDLES, JR. AMERICAN CORRECTIONAL
ASSOCIATION; JOHN AND JANE DOES 1-3;
HEALTH ASSURANCE LLC AND J. L. WHITE

DEFENDANTS

DEFENDANTS EXHIBIT LIST

| <u>NO.</u> | <u>DESCRIPTION</u> | <u>SPONSOR</u> | <u>ID</u> | <u>EVID</u> |
|------------|---|----------------|-----------|-------------|
| D-1 | Gulfport Police Dept. Narrative report completed by Officer Roe 06/17/06.(Pg.1 of 2 & 2 of 2) | | | 8/25/10 |
| D-2 | Uniform Arrest/Booking Form 06/17/06 | | | 8/25/10 |
| D-3 | Traffic Accident Report 06/17/06 (Pg. 1- 6) | | | 8/25/10 |
| D-4 | Black and White Booking Photo | | | 8/23/10 |
| D-6 | Health Assurance, LLC - Nurse's Notes 06/17/06 | | | |
| D-7 | Post Assignment - 06/17/06 (0700 -1900) | | | |
| D-8 | Narrative - Sgt. Leonard - 06/17/06 | | | |
| D-9 | Narrative - Sgt. Leonard - 06/18/06 | | | |

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|-------------|---|--|--|---------|
| D-10 | Use of Force Report - 06/17/06 (Pg. 1-2) | | | 8/23/10 |
| D-11 | Narrative Form, completed by Priest - 06/17/06 | | | 8/23/10 |
| D-12 | Omitted | | | |
| D-13 | Google Map of location of Lookout 49, Boone's Tavern, Cabana Lounge, and location of Accident | | | |
| D-14 | Photograph of Lookout 49 | | | |
| D-15 | Photograph of Restaurant Flare (formerly Lookout 49)(Pg. 1) Photograph of Restaurant Flare(formerly Lookout 49)(Pg. 2) | | | |
| D-16 | Photograph of Boone's Tavern | | | |
| D-17 | Photograph of Boone's Tavern | | | |
| D-18 | Photograph of Cabana Lounge | | | |
| D-19 | Gulfport Municipal Court Record Case #200613946 | | | 8/25/10 |
| D-20 | Memorial Hospital at Gulfport Medical Records (Bates Lables - MHG 001, 39, 40, 49, 50, 74, 75, 88, 93, 103, 118, 123, 137, 141-163, 258, 259, 261, 264-316, 334-350, 353, 354, 359, 360, 367-378, 487-500, 502, 550, 551, 703, 720, 735, 768, 771, 772). | | | 8/23/10 |
| D-21 | Omitted | | | |
| D-22 | Advanced Orthopedics Medical Records | | | 8/23/10 |
| D-23 | Omitted | | | |
| D-24 | Beatline Internal Medicine Medical Records (Bates Labels- Carrubba MHG/Beatline Int. Med (Farrar) 001 - 038 | | | 8/23/10 |

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|-------------|--|--|--|---------|
| D-25 | Gulf Coast Mental Health Records (produced per Court Order) (Bates Labels - Carr. GCMHC 001, Carrubba Gulf Coast Mental Health 0017, Carr. GCMHC 017, 019-023, 058-071, 099, 101, 149, 155-166, 191, 193-197, 207, 208). (Redacted Records; Bates Labels - Carr. GCMHC 070, 193, 194, 195-197, 202) | | | |
| D-26 | Compass Imaging LLC Medical Records (Bates Labels - Carrubba Compass 001-011) | | | 8/23/10 |
| D-27 | HCADC Policies and Procedures Directive Use of Force | | | |
| D-28 | HCADC Policies and Procedures Directive Use of Restraints | | | |
| D-29 | HCADC Policies and Procedures Directive Health Care Services | | | |
| D-30 | HCADC Policies and Procedures Directive Inmate Grievance | | | |
| D-31 | HCADC Policies and Procedures Directive Chain of Command | | | |
| D-32 | HCADC Policies and Procedures Directive Monthly Statistical Reporting | | | |
| D-33 | HCADC Policies and Procedures Directive Booking and Receiving | | | |
| D-34 | HCADC Policies and Procedures Directive Training for Correctional Officers | | | |
| D-35 | HCADC Policies and Procedures Directive Training Plans | | | |
| D-36 | HCADC Policies and Procedures Directive Facility Goals | | | |
| D-37 | HCADC Policies and Procedures Directive | | | |

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|------------------------------|---|--|--|--|---------|
| Supervision of Holding Cells | | | | | |
| D-38 | Harrison County Sheriff's Dept. General Order #1, Code of Ethics | | | | 8/23/10 |
| D-39 | Harrison County Sheriff's Dept. General Order #2, Incident Data Collection - Basic Report Writing Rules | | | | |
| D-40 | Harrison County Sheriff's Dept. General Order #10, Weapons and Use of Force | | | | |
| D-41 | Omitted | | | | |
| D-42 | Harrison County Sheriff's Dept. General Order #62, Employee Discipline | | | | |
| D-43 | Harrison County Sheriff's Dept. General Order #65, Professional Standards Unit | | | | |
| D-44 | Diagram of Jail | | | | |
| D-45 | Diagram of Booking Department | | | | |
| D-46 | ACA Accreditation Contracts (ACA Contract dated 01/13/01, Pg. 1-4) (ACA Contract dated 03/18/02, Pg. 5-8) (ACA Contract dated 11/05/02, Pg. 9-12) (ACA Contract dated 5/03/05, Pg. 13-15) | | | | |
| D-47 | Steve Martin's Reports (July 25, 2000, Pg.1-9) (April 20, 2001, Pg. 10-17) (February 20, 2005, Pg. 18-27) | | | | |
| D-48 | Letter to Steve Martin from Capt. Phil Taylor 05/24/06(Pg. 1-2) | | | | |
| D-49 | IA Report; IA2002-81 (Pg. 1-2) | | | | |
| D-50 | IA Report; IA2003-05 (Pg. 1-2) | | | | |

- D-51 IA Report; IA2003-06
(Pg. 1-6)
- D-52 IA Report; IA2003-08
- D-53 IA Report; IA2003-09
- D-54 IA Report; IA2003-11
(Pg. 1-2)
- D-55 IA Report; IA2003-14
(Pg. 1-3)
- D-56 IA Report; IA2003-15
(Pg. 1-2)
- D-57 IA Report; IA2003-19
(Pg. 1-2)
- D-58 IA Report; IA2003-21
(Pg. 1-4)
- D-59 IA Report; IA2003-22
(Pg. 1-4)
-Termination Letter of Scott Thompson
(Pg.5)
- D-60 IA Report; IA2003-23
- D-61 IA Report; IA2003-23
(Pg. 1-3)
- D-62 IA Report; IA2003-24
(Pg. 1-4)
- D-63 IA Report; IA2003-29
(Pg. 1-7)
- D-64 IA Report; IA October 23, 2003
- D-65 IA Report; IA2003-34
(Pg. 1-4)

8/23/10

- D-66 IA Report; IA2003-37
(Pg. 1-2)
- D-67 IA Report; IA2003-44
(Pg. 1-2)
- D-68 IA Report; IA2004-001
(Pg. 1-9)
- D-69 IA Report; IA2004-02
(Pg. 1-9)
- D-70 IA Report; IA2004-03
(Pg. 1-9)
- D-71 IA Report; IA2004-04
(Pg. 1-5)
- D-72 IA Report; IA2004-08
(Pg. 1-2)
- D-73 IA Report; IA2004-09
(Pg. 1-4)
- D-74 IA Report; IA2004-13
(Pg. 1-3)
- D-75 IA Report; IA2004-18
(Pg. 1-3)
- D-76 IA Report; IA 2004-19
(Pg. 1-4)
- D-77 IA Report; IA2004-20
(Pg. 1-4)
- D-78 IA Report; IA2004-22
(Pg. 1-10)
- D-79 IA Report; IA2004-27
(Pg. 1-6)

8/23/10

- D-80** IA Report; IA2004-30
(Pg. 1-4)
-Letter of Disciplinary Action of Patricia Farris
(Pg. 5)
- D-81** Omitted
- D-82** IA Report; IA2005-05
(Pg. 1-4)
- D-83** IA Report; IA2005-06
(Pg. 1-5)
-Letter of Disciplinary Action of Lee Otis Jackson
(Pg. 6)
- D-84** IA Report; IA2005-07
(Pg. 1-9)
-Letter of Disciplinary Action of Daniel Evans,
05/06/05 (Pg. 10)
- D-85** IA Report; IA2005-008
(Pg. 1-3)
- D-86** IA Report; IA2005-10
(Pg. 1)
-Notice of Hearing of Hearing of Deputy Jerred Necaïse
5/5/05 (Pg. 2)
-Letter of Resignation of Deputy Jerred Necaïse
5/09/05 (Pg.3)
- D-87** IA Report; IA2005-14
(Pg. 1-2)
- D-88** IA Report; IA2005-16
(Pg. 1-5)
- D-89** IA Report; IA2005-18
(Pg. 1-5)
- D-90** IA Report; IA2005-22
(Pg. 1-3)

8/23/10

D-91 IA Report; IA2005-23
(Pg. 1-2)

D-92 IA Report; IA2005-24
(Pg. 1-2)

D-93 IA Report; IA2005-25
(Pg. 1-3)

D-94 IA Report; IA2005-34
(Pg. 1-6)
-Admin. Leave Letter for Dedri Caldwell,
12/12/05 (Pg. 7)
-Letter of Disciplinary Action for Dedri Caldwell
12/21/05 (Pg. 2)
-Written Reprimand to Justin Richards,
1/11/06 (Pg. 9)
-Written Reprimand to Dereck Blankinchip,
1/11/06 (Pg. 10)
-Notice of Hearing to Kenneth Roberson,
1/03/06 (Pg. 11)
-Written Reprimand to Kenneth Roberson,
1/11/06 (Pg. 12)
-Written Reprimand to Morgan Thompson,
1/11/06 (Pg. 13)
-Notice of Hearing to James Nicholson,
1/6/06 (Pg. 14)
-Termination Notice to James Nicholson,
1/13/06 (Pg. 15)
-Written Reprimand to Ben Lamey,
1/11/06 (Pg. 16)

D-95 IA Report, IA2006-04
(Pg. 1-6)
-Letter of Disciplinary Action to Dereck Blankinchip
2/08/06 (Pg. 7)
-Letter of Disciplinary Action to Eddie Collins
1/26/06 (Pg. 8)

D-96 IA Report, IA2006-05
(Pg. 1-8)
-Letter of Disciplinary Action to Daniel Evans

8/23/10

- 4/4/06 (Pg. 9)
- Letter of Disciplinary Action to Karl Stolze
4/4/06 (Pg. 10)
- D-97** IA Report, IA2004-30 (pg. 1)(Duplicate See Exhibit D-80)
- Letter of Disciplinary Action of Patricia Farris (pg. 2)
- D-98** IA Report, IA2006-02A
(Pg. 1-2)
- D-99** IA Report, IA2006-06
(Pg. 1-3)
- D-100** IA Report, Investigation of complaint by
Gretchen Bravo, 3/29/06
- D-101** IA Report, IA2006-0015
(Pg. 1-2)
- D-102** IA Report, IA2006-17
(Pg. 1-4)
- D-103** IA Report, IA2006-16, April 27, 2006
(Pg. 1-2)
- D-104** IA Report, IA2006-21, May 22, 2006
(Pg. 1-2)
- D-105** Notice of Hearing of Dedri Caldwell,
8/16/05 (Pg. 1)
- Letter of Disciplinary Action for Dedri Caldwell
8/18/05 (Pg. 2)
- D-106** IA Report, IA2004-29
(Pg. 1-6)
- Use of Force Report of Joseph Towner, 11/12/04
(Pg. 7)
- Letter of Disciplinary Action of Martin Lipscomb
1/31/05 (Pg. 8)
- Letter of Disciplinary Action of Michael Minor
1/31/05 (Pg. 9)
- Letter of Disciplinary Action of Jerred Necaie
1/31/05 (Pg. 10)

8/23/10

- Letter of Disciplinary Action of Justin Branning
1/31/05 (Pg. 11)
- Letter of Disciplinary Action of Jeffrey Brawner
1/31/05 (Pg. 12)
- Letter of Resignation of Jay Cox
1/4/05 (Pg. 13)

- D-107** Use of Force Report of Uther Street,
11/16/04 (Pg. 1-2)
- Rule Violation Report of Uther Street,
11/16/04 (Pg. 3)
 - Narrative Form of Nathan Ellsberry,
11/16/04 (Pg. 4 -5)
 - Narrative Form of Joel Phillips,
11/16/04 (Pg. 6)
 - Narrative Form of Jeffrey Brawner,
11/16/04 (Pg. 7-8)
 - Narrative Form of Phillips
11/16/04 (Pg. 9)
 - OC Administration Warning
11/16/04 (Pg. 10)

- D-108** Use of Force of Henry Johnson,
11/28/04 (Pg.1-2)
- Narrative Form of Justin Branning
11/28/04 (Pg. 3)

- D-109** Use of Force of Alonzo Reeves,
12/14/04 (Pg. 1-2)
- Narrative Form of Nathan Ellsberry,
12/15/04 (Pg. 3)
 - Narrative Form of Justin Branning,
12/14/04 (Pg. 4)
 - Narrative Form of McBeath,
12/15/04 (Pg. 5)
 - Narrative Form of Thomas Wills,
12/14/04 (Pg. 6-7)
 - Narrative Form of Ryan Teel,
12/14/04 (Pg. 86)

- D-110** HCADC - Booked In/Released Inmates Chart;
2000-2006.
(Pg. 1- 2)

8/23/10

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| D-111 Inter Office Memo from Capt. Rick Gaston - Handling of Inmates, 4/12/05 | | | | 8/23/10 |
| D-112 HCADC Booking Area Video - June 11, 2006, 18:20 - June 19, 2006, 07:20 | | | | 8/23/10 |
| D-113 HCADC Booking Area Video- June 16, 2006, 17:15 - June 17, 2006, 18:21 | | | | |
| (D-112 & D-113 have been compiled into one DVD <u>Exhibit D-112</u>) | | | | |
| D-114 Dr. Jordan Medical Records (Bates Labels, Carrubba Southwest Ctr. for Ortho. 001 -003) | | | | 8/23/10 |